



May 22, 2006

Docket Clerk, Fruit and Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW.  
Stop 0243  
Washington, DC 20250-0243  
Docket No. FV06-1290-1 PR  
RIN 0581-AC59  
Attn: Trista Etzig

On behalf of the Canned Food Alliance (CFA) and its member companies, I am providing comments in response to the April 20, 2006 proposed rule: *Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection*. This rulemaking is an important step in assuring that specialty crop block grant funds are used appropriately by states to enhance the competitiveness of specialty crops with the ultimate goal of helping consumers improve their health by eating more fruits and vegetables. The important role of fruits and vegetables in contributing to good health and preventing disease cannot be overstated. One of the most significant outcomes of the *2005 Dietary Guidelines for Americans* is the increased emphasis on fruits and vegetables – nearly half of one's diet should now be comprised of fruits and vegetables – about 4 ½ cups per day for most moderately active adults and 3 cups for young children.

While the Specialty Crop Block Grant Program ("SCBGP") can and should be a positive factor in helping Americans meet current fruit and vegetable recommendations, the CFA is concerned that as currently proposed, the rule is inconsistent with the clear intent of Congress when it passed the Specialty Crop Competitive Act in 2004 (Public Law 108-465) and will limit consumer choice by excluding the promotion of all types of specialty crops – including canned fruits and vegetables. The rule also does not recognize the growing body of evidence on the benefits of canned fruits and vegetables. The following comments expand on these two concerns.

## **1. The proposed rule is contrary to Congressional intent.**

Section 1290.4 of the proposed rule: *Eligible grant project*, states that:

(a) To be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops. **Priority will be given to fresh specialty crop projects.**

This section of the proposed rule has no basis in either the authorizing legislation or the accompanying report (H. Rept. 108-750). Nowhere in the legislation or report does Congress give priority to “fresh” specialty crop projects. Indeed, the word “fresh” does not even appear in the legislation. This clearly shows that Congress intended to level the playing field for all types of specialty crops. *USDA is exceeding its authority by imposing a regulatory criterion where there is clear evidence that Congress never intended for there to be one.* As currently drafted, the rule will restrict state departments of agriculture from promoting a variety of specialty crops – regardless of form, and will ultimately limit consumer choice.

## **2. The proposed rule ignores clear scientific evidence on the benefits of canned fruits and vegetables.**

The proposed rule ignores the growing body of evidence on the nutrient contributions of many canned fruits and vegetables, consumer approval of canned fruits and vegetables, and food safety benefits of canned products.

Perhaps of most significance, the proposed rule is counter to federal dietary guidance urging Americans to consume a variety of fruits and vegetables in all forms. The government’s own ***Dietary Guidelines for Americans 2005*** identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits and vegetables. Nowhere in the Dietary Guidelines is preference given for fresh fruits and vegetables. At a time when most Americans eat far below the daily recommended servings of fruits and vegetables (Americans average about 3.5 servings – versus 9 servings recommended for most adults), USDA should not establish policies that restrict and limit promotion efforts to only focus on fresh products; consumers need to be educated on the benefits of all types of fruits and vegetables in order for consumption to increase.

The attached fact sheet – “Can Fit” – highlights the many positive attributes associated with canned fruits and vegetables, including the superior nutrient profile for certain fruits and vegetables, consumer preference for canned fruits and vegetables, nutrient losses for fresh produce, nutrient retention for canned and food safety. Consider the following:

**The form of the ingredients does not determine a recipe’s acceptability and nutrient content.** University of Massachusetts research found that, nutritionally and taste-wise, recipes prepared with canned ingredients and those prepared using fresh and/or frozen ingredients were rated comparably.

**All forms of fruits and vegetables make a positive contribution to the diet.** University of Illinois research showed that canned foods are comparable to cooked fresh and frozen varieties in their contribution to the American diet.

**Fresh does not always mean more nutritious.** A recent review of existing research by the University of California, Davis, revealed that loss of nutrients in fresh products may be substantial and that storage and cooking can lead to overall losses of up to half prior to consumption.

**Canned fruits and vegetables are safe.** The metal food can is one of the safest types of food packaging – it is tamper resistant, airtight, thermally sterilized and shelf stable.

Please refer to the attached fact sheet for more details on the benefits of canned fruits and vegetables.

On behalf of the CFA, thank you for considering these comments. I urge USDA to issue a final rule that is consistent with the will of Congress and recognizes the importance of promoting all types and forms of healthy and nutritious specialty crops. Restricting promotion efforts is counter to open and necessary competition, sound public policy and enhanced public health. At a time of increasing obesity rates and health care costs, consumers deserve a range of options to encourage greater consumption of fruits and vegetables.

Sincerely,



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***About the Canned Food Alliance***

*The Canned Food Alliance (CFA) is a partnership of the American Iron and Steel Institute's Steel Packaging Council, the Can Manufacturers Institute, select food processors and affiliate members. The primary mission of the CFA is to serve as a resource for information on the nutrition, convenience, contemporary appeal and versatility of canned food. For hundreds of mealtime solutions, visit [www.mealtime.org](http://www.mealtime.org).*



## CAN Fit

### Canned Fruits and Vegetables Fact Sheet

#### Convenience -- Affordability -- Nutrition

The government's *Dietary Guidelines for Americans 2005* recognize canned foods play a significant role in helping children and their families meet *MyPyramid's* recommendations. The U.S. Department of Agriculture's new food guidance system identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits, vegetables, meats and beans.

Increased promotion of nutritious, convenient fruits and vegetables to children was a recommendation of the Joint Workshop of the Federal Trade Commission and the Department of Health and Human Services. In its April 2006 Report: *Perspectives on Marketing, Self-Regulation, and Childhood Obesity*, FTC and HHS state that "...processing and packaging technologies are allowing companies to make fruit and vegetables more convenient for consumers." Canned fruits provide a convenient and safe alternative to less nutritious snacks and beverages and are making their way into vending machines, quick service restaurants, and other convenience-oriented venues.

**The ingredients you choose, not the form of the ingredients, are what really determine a recipe's nutrient content.** A three-part study conducted by the University of Massachusetts found that, nutritionally and taste-wise, recipes prepared with canned ingredients and those prepared using fresh and/or frozen ingredients were rated comparably. This research also showed similar nutrient profiles of dishes made from canned, cooked fresh and/or frozen ingredients.

**All forms of fruits and vegetables make a positive contribution to the diet.** Studies conducted by the University of Illinois Department of Food Science and Human Nutrition also confirmed that canned foods are comparable to cooked fresh and frozen varieties in their contribution to the American diet.

**Fresh does not always mean more nutritious.** A recent review of existing research (pending publication) on fresh, frozen and canned fruits and vegetables by the University of California, Davis, reveals that loss of nutrients in fresh products may be more substantial than commonly perceived: storage and cooking can lead to overall losses of up to half prior to consumption.

**Some canned products actually contribute more health promoting antioxidants than their fresh counterparts.**

- An Oregon Health Sciences University study demonstrated increased amounts of some key anthocyanins, a powerful antioxidant, in canned blueberries, compared to the amounts in fresh and frozen blueberries.
- In addition, canned tomatoes and tomato sauces are among the best sources of lycopene. According to the U.S. Department of Agriculture, one-half cup of canned tomatoes provides 11.8 milligrams of lycopene compared to just 3.7 milligrams found in one medium fresh, uncooked tomato. Mild heat treatment of carrots and spinach, as used in commercial canning, enhances the bioavailability of carotene, which is converted to vitamin A in the body. The absorption of lutein in corn, an antioxidant that may reduce the risks of cataracts and macular degeneration, also is enhanced by heat from the canning process, according to research from Cornell University.

- Canned pumpkin is loaded with beta carotene, a substance from plants that converts to Vitamin A and is said to protect against certain types of cancer and heart disease. Canned pumpkin contains a higher concentration of beta carotene than fresh pumpkin because of the canning process.

**Canned fruits make a significant contribution to key nutrients.** Canned fruits such as pineapple and peaches can make significant contributions to the RDA for vitamin C.

**Fiber is unchanged regardless of fruit or vegetable form.** In general, the USDA database shows that fresh, frozen and canned fruits and vegetables contained similar amounts of fiber. Overall, canned fruits and vegetables were never consistently lower than fresh or frozen products for *any* nutrient.

**Canned fruits and vegetables do not contribute significantly to American's sugar and sodium intake.** In fact, all fruits and fruit juices contribute less than 2 percent of added sugars in most American's diets (JADA, 2000, vol. 100) and vegetables contribute less than 1 percent (JADA, 2004, vol. 104) of sodium.

**Canned fruits and vegetables are safe.** In a review of nearly 4,500 foodborne-related outbreaks and over 138,500 cases of illness, the produce category alone was linked to the largest number of foodborne illnesses associated with outbreaks – over 28,000 cases of illness. However, commercially produced canned fruits and vegetables did not directly account for a single foodborne outbreak. Home canned fruits and vegetables accounted for 3% of the outbreaks. (Center for Science in the Public Interest *Outbreak Alert: Closing the Gaps in Our Federal Food-Safety Net*, Nov. 2005.) The metal food can is one of the safest types of food packaging – it is temper resistant, provides an airtight seal, is thermally sterilized, and shelf-stable.

**Canned fruits and vegetables are affordable.** The USDA Economic Research Service July 2004 report (How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790) concluded that: "...whether fresh, frozen, or canned, all 85 of the vegetables we priced were less than a dollar per serving, only three cost more than 75 cents a serving, and more than half were less than a quarter."

*For more information, contact Rich Tavoletti, executive director of the Canned Food Alliance, at 412-922-2772 or via e-mail at [rctsri@aol.com](mailto:rctsri@aol.com)*

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### References (listed in order of appearance)

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- U.S. Department of Agriculture, Economic Research Service report: How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790, <http://www.ers.usda.gov/publications/aib790/aib790.pdf>